

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KENNETH BROOKS,)
Plaintiff,)
)
V.) Case Number: 1:05-cv-11674
)
THE UNITED STATES OF AMERICA, and)
MARY JANE ESTRADA, N.P.)
Defendants.)

Now comes the plaintiff, Kenneth Brooks, and pursuant to FRCP 26, Local Rule 16 and 26, makes the following initial discovery disclosures regarding the diagnosis, care, or treatment of Kenneth Brooks.

Pursuant to FRCP 26(a)(1)(A), the plaintiff identifies the following individuals as likely having discoverable information regarding the care and treatment of Kenneth Brooks.

1. **Michael Folino, M.D.**
Geiger-Gibson Community Health Center
250 Mount Vernon Street
Dorchester, MA 02125
2. **Weiru Shao, M.D.**
New England Medical Center
750 Washington Street
Boston, MA 02111
3. **Stephen G. Werth, M.D.**
Associates of South Shore Dermatology
Carney Hospital
Seton MOB, Suite 206
2110 Dorchester Avenue
Dorchester, MA 02124
4. Any and all medical providers at **Geiger-Gibson Community Health Center**, 250 Mt. Vernon St., Dorchester, MA 02125, including but not limited to:

Michael Folino, M.D.

Robert Hoch, M.D.
Elizabeth Kissinger, M.D.
Stefan Jahng, M.D.
David Gunther, M.D.
Mary Jane Estrada, M.D.

5. Any and all medical providers at **New England Medical Center**, 750 Washington Street, Boston, MA 02111, including but not limited to:

Weiru Shao, M.D.
Donald Annino, M.D.
Rahul Shah, M.D.
Stephen P. Naber, M.D.
Arthur Tischler, M.D.
Adarsh Vasanth, M.D.
Lynn Kandar, R.N.
William Jackson, M.D.
Kathy Goldrick, R.N.
Marian Lemieux, R.N.
Scott Weiner, M.D.
Nicholas Ross, M.D.
Barbara English, R.N.
Nancy Dryer, R.N.
Michael Chan, M.D.
Markus Fitzek, M.D.

Pursuant to FRCP 26(a)(1)(B), the plaintiff has already provided the complete medical and office records from each of the following health care providers in her Rule 35.1 Disclosure of Medical Records.

1. Medical records from Michael Folino, M.D.
2. Medical records from Associate of South Shore Dermatology, including reports and notes from Stephen Werth, M.D.
3. Medical records, including office notes, laboratory results, and radiology reports, from New England Medical Center.
4. Medical records, including radiology and oncology reports from Geiger-Gibson Community Health Center.
5. Medical records, and notes from Weiru Shao, M.D.

Pursuant to FRCP 26(a)(1)(C), the plaintiff is currently in the process of collecting and assessing the appropriate medical bills and will disclose an itemization of

medical expenses as soon as they are received. Further answering, a computation of damages may be determined by an economist.

Respectfully submitted,
The plaintiff,
By his attorney,

/s/ William J. Thompson
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